

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

BODYGUARD PRODUCTIONS,  
INC., et al.,

Plaintiffs,

vs.

RCN TELECOM SERVICES OF  
MASSACHUSETTS, LLC and RCN  
TELECOM SERVICES, LLC,

Defendants.

**No. 3:21-cv-15310-GC-TJB**

**DECLARATION OF KYLE G.  
GOTTUSO IN SUPPORT OF *PRO  
HAC VICE* ADMISSION**

I, KYLE G. GOTTUSO, of full age, certify as follows:

1. I am an attorney with the law firm of Armstrong Teasdale LLP. My office address is 7700 Forsyth Blvd., Suite 1800, St. Louis, Missouri 63105-1847. My contact information is as follows: telephone number 314.342.4131 and email address KGottuso@atllp.com.

2. I am a member in good standing of the following Bars:

Court	Year Admitted
U.S. District Court for the Eastern District of Missouri 111 South 10th Street St. Louis, MO 63102	2012
State of Missouri	2012
U.S. District Court for the Western District of Missouri 400 E 9th St Kansas City, MO 64106	2012

Court	Year Admitted
U.S. Court of Appeals for the Federal Circuit 717 Madison Place, NW Washington, DC 20439	2016

3. I have never been suspended or disbarred by any court or administrative body and no disciplinary action is currently pending against me. I understand my continuing obligation to advise the court of any disciplinary proceedings.

4. I have not been granted a special appearance to participate in an action in the United States District Court for the District of New Jersey previously during this calendar year.

5. RCN Defendants have requested my participation in this litigation as attorney *pro hac vice*.

6. I am associated in the above-captioned case with counsel of record for this action, Edward F. Behm, Jr., also of the firm of Armstrong Teasdale LLP. Mr. Behm is a member of good standing in this Court.

7. I am aware I have an obligation under N.J. Court Rule 1:28-2(a) to make payment to the New Jersey Lawyers' Fund for Client Protection for every year in which I continue to represent a client in a matter pending in this Court.

8. If admitted *pro hac vice*, I will pay \$150.00 to the Clerk of the District Court of New Jersey pursuant to Local Civil Rule 101.1(c)(3).

9. I shall comply with and be bound by the Rules of the United States District Court for the District of New Jersey, including provisions of Local Civil Rule 103.1, *Judicial Ethics and Professional Responsibility*, and Local Civil Rule 104.1, *Discipline of Attorneys*, and by New Jersey Court Rule 1:21-7 and its limitations on tort fees. I also agree to notify the Court immediately of any matter affecting my standing at the bar of any other court.

10. I have read the Local Rules of this Court and I am familiar with them.

11. Counsel for Plaintiffs has consented to the application.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

/s/ Kyle G. Gottuso  
Kyle G. Gottuso

Dated: February 6, 2023